



Globalstar LLC

461 S. Milpitas Blvd.
Milpitas, CA 95035
USA

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Federal Communications Commission
Office of Secretary

January 9, 2006

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Iridium Satellite LLC, Special Temporary Authority, File Nos. SAT-STA-20050923-00180/00181.

Review of the Spectrum Sharing Plan of the Non-Geostationary Satellite
Orbit Mobile Satellite Service Systems in the 1.6/2.4 GHz Bands, IB
Docket No. 02-364.

Dear Ms. Dortch:

This letter responds to a request from FCC staff for technical data after November 1, 2005, when the referenced Special Temporary Authority ("STA") expired.

Figure 1 shows the radio link failures ("RLF") by channel for Globalstar's Clifton gateway service from August 3 to November 23, 2005. The radio link failures in Globalstar Channels 7 and 8 continued to be high compared to channel 3 even after the Iridium STA expired. Note that the STA affected only the portion of Globalstar's Channel 7 falling in the frequency range 1617.495 to 1618.25 MHz. The complete Globalstar channel 7 band is from 1617.495 to 1618.725 MHz. The 1618.25 to 1618.725 MHz portion of channel 7, as well as the 1618.725 to 1619.955 MHz portion of Channel 8, is shared with Iridium both before and after the STA period. Channel 9 is not assigned to the Clifton gateway.

Figure 1 also shows the results of the test conducted by Globalstar from October 27 to October 31, 2005, after Globalstar channel 7 had been replaced with Globalstar channel 4. During this test period, the RLF in Channel 4 were identical to the RLF in Channel 3. In contrast, RLF in Channel 8 continued to remain high during this period. On November 1, Channel 7 was brought back in service to confirm the previously observed performance degradation. The RLF in Channel 7 returned to its high rate after it was switched with Channel 4, and the performance did not match the superior performance of Channel 4 during the test period.

These data make clear that channel 7 and channel 8, which are shared with Iridium, experienced high RLF during the study period; the same traffic was handled by

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channels 4 and 8 with low RLF in channel 4 and high RLF in channel 8. This shows that, as predicted by Globalstar, Iridium's use of frequencies below 1621.35 MHz causes interference to Globalstar when the traffic in both systems is high, as was the case in September - October 2005. This interference will only worsen over time as both systems gain subscribers.

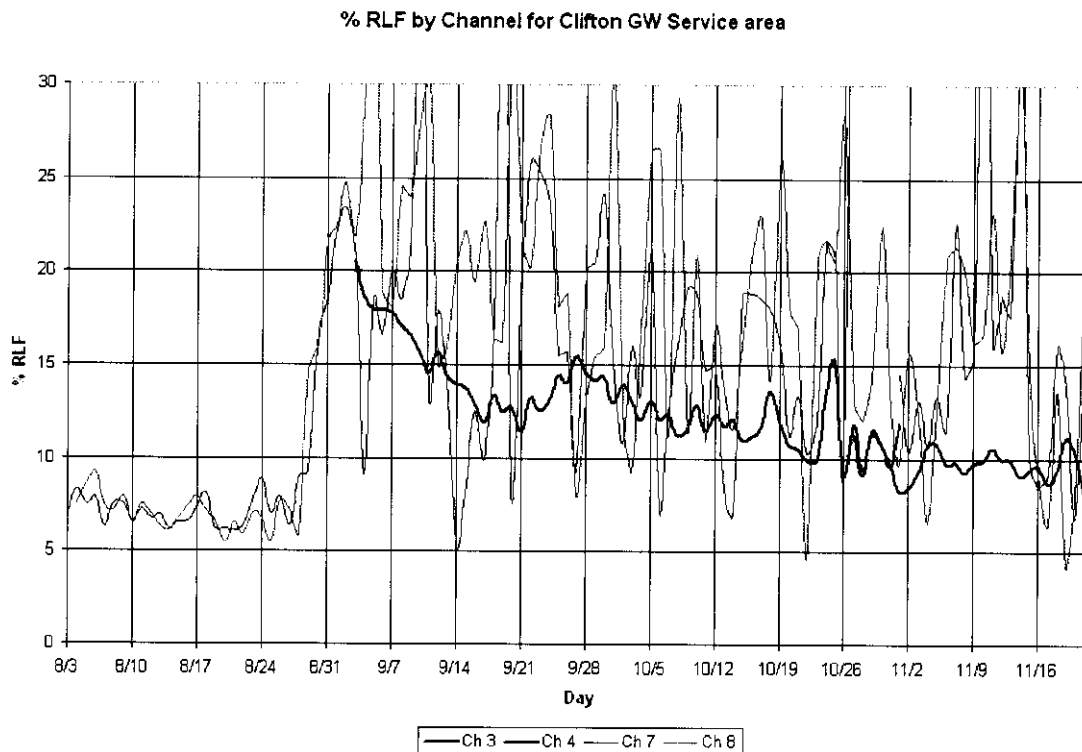


Figure 1: % RLF by Channel for Clifton GW Service Area from 8/3 to 11/23

Should you have further questions concerning this matter, please contact the undersigned.

Sincerely,

William F. Adler
Vice President-Legal & Regulatory Affairs

cc: Robert G. Nelson
Chip Fleming
Howard Griboff
R. Michael Senkowski